

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

COLLEEN KUCHAR)	
On behalf of herself and all others similarly)	CASE NO. 1:20-cv-2542
situated,)	
)	JUDGE JAMES S. GWIN
)	
Plaintiff,)	
v.)	
)	
SABER HEALTHCARE HOLDINGS,)	<u>PLAINTIFF'S MOTION FOR LEAVE</u>
LLC, <i>et al.</i> ,)	<u>TO FILE MOTION FOR</u>
)	<u>CONDITIONAL CERTIFICATION</u>
)	<u>AND MEMORANDUM IN SUPPORT</u>
Defendants.)	<u>UNDER SEAL</u>
)	

Plaintiff respectfully requests leave to file under seal her Motion for Conditional Fair Labor Standards Act Certification and Memorandum in Support.

On April 14, 2021, at ECF #27, the parties filed a Stipulated Protective Order, which has not yet been signed. Many of the documents produced by Defendants to date in this action have been marked as "Confidential" under that stipulation, including several of the documents which Plaintiff intends to attach to her conditional certification motion as Exhibits.

Based upon the foregoing, Plaintiff requests leave to file her Motion for Conditional Certification and Memorandum in Support under seal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of May, 2021, the foregoing was filed electronically. Notice of this filing will be sent to all parties who have made an appearance by operation of the Court's electronic filing system and those parties may access the filing through the Court's system.

/s/ Scott D. Perlmutter
SCOTT D. PERLMUTER (0082856)